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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of All Others Similarly Situated,	:	1:03-cv-12628 (NG)
Plaintiff,	:	RELATED ACTIONS:
vs.	:	1:04-cv-10046 (NG)
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	1:04-cv-10055 (NG)
Defendants.	:	1:04-cv-10065 (NG)
	:	1:04-cv-10077 (NG)
	:	1:04-cv-10078 (NG)
	:	1:04-cv-10090 (NG)
	:	1:04-cv-10144 (NG)
	:	1:04-cv-10155 (NG)
	:	1:04-cv-10179 (NG)
	:	1:04-cv-10189 (NG)
	:	1:04-cv-10190 (NG)
	:	1:04-cv-10202 (NG)
JOHN G. ESPOSITO, JR., Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10013 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	
JOSEPH L. KING, Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10038 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	

MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL

William E. Homeyer, Jr., William Kim, Gernot Buerger, Thomas Echlin, and Richard M. Acuna (collectively, the "Homeyer Group" or "Movants"), by their counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing the Homeyer Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); and (iii) approving the Homeyer Group's selection of Milberg Weiss Bershad Hynes & Lerach LLP and Rabin, Murray & Frank LLP as Co-Lead Counsel, and Moulton & Gans, P.C. as Liaison Counsel of the actions, pursuant to the PSLRA. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

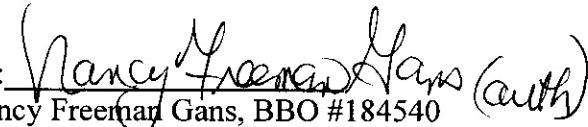
REQUEST FOR ORAL ARGUMENT

Movants respectfully request oral argument on this motion.

DATED: March 1, 2004
Boston, Massachusetts

Respectfully submitted:

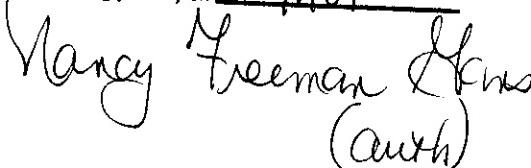
MOULTON & GANS, P.C.

By: 
Nancy Freeman Gans, BBO #184540
33 Broad Street, Suite 1100
Boston, MA 02109-4216
Telephone: (617) 369-7979

Proposed Liaison Counsel

MILBERG WEISS BERSHAD HYNES & LERACH LLP
Steven G. Schulman
Peter E. Seidman
Sharon M. Lee
One Pennsylvania Plaza
New York, NY 10119
(212) 594-5300

CERTIFICATE OF SERVICE
I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (by hand) on 3/1/04


(auth)

RABIN MURRAY & FRANK LLP

Eric J. Belfi
275 Madison Avenue
New York, NY 10016
(212) 682-1818
(212) 682-1892

Proposed Co-Lead Counsel

**LAW OFFICES OF BRUCE G.
MURPHY**

Bruce G. Murphy
265 Llwyds Lane
Vero Beach, FL 32963
(772) 231-4202

Attorney for Plaintiff